

IN THE UNITED STATES BANKRUPTCY COURT  
FOR EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Constance L. Lapham  
Debtor

CASE NO.: 22-11004-mdc

CHAPTER 13

Fay Servicing, LLC as servicer for US  
Bank Trust National Association, Not In  
Its Individual Capacity But Solely As  
Owner Trustee For VRMTG Asset Trust  
v.

Judge: Magdeline D. Coleman

Hearing Date:

Constance L. Lapham  
KENNETH E. WEST - Bankruptcy  
Trustee

Objection Deadline:

Respondents

**NOTICE OF APPEARANCE**

**PLEASE TAKE NOTICE** that the undersigned hereby appears in the above-captioned Chapter 13 case on behalf of Fay Servicing, LLC as servicer for US Bank Trust National Association, Not In Its Individual Capacity But Solely As Owner Trustee For VRMTG Asset Trust, and hereby requests that all notices given or required to be given in these cases, and all papers served or required to be served in these cases, be given to and served upon the following:

**FRIEDMAN VARTOLO LLP**

Attorneys for Fay Servicing, LLC as Servicer for  
US Bank Trust National Association, Not In Its  
Individual Capacity But Solely As Owner Trustee  
For VRMTG Asset Trust  
1325 Franklin Avenue, Suite 160  
Garden City, NY 11530  
[Bankruptcy@FriedmanVartolo.com](mailto:Bankruptcy@FriedmanVartolo.com)

**PLEASE TAKE FURTHER NOTICE** that the foregoing demand includes all pleadings of any kind including, without limitation, all notices, motions, complaints, and orders, whether written or oral, formal, or informal, however transmitted, related in any way to the debtor, its property or its estates. The persons listed above request that their names and addresses be added to the mailing matrix.

**PLEASE TAKE FURTHER NOTICE** that neither this Notice of Appearance and Demand for Service of Papers nor any later appearance, pleading, proof of claim, claim, or suit shall constitute a waiver of (i) the right to have final orders in non-core matters entered only after de novo review by a District Judge, (ii) the right to trial by jury in any proceeding triable in this case or any case, controversy, or proceeding related to this case, (iii) the right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (iv) any objection to the jurisdiction or venue of this Court for any purpose other than with respect to this Notice, (v) an election of remedy, or (vi) any other right, claim, defense, setoff, or recoupment, in law or in equity, under any agreement, all of which are expressly waived.

Dated: November 3, 2023

By: /s/ Lauren Moyer  
Lauren Moyer, Esq.  
**FRIEDMAN VARTOLO LLP**  
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**CERTIFICATE OF SERVICE OF NOTICE OF APPEARANCE**

I certify under penalty of perjury that I served the above captioned pleading on the parties at the addresses specified below or on the attached list on November 3, 2023.

The type(s) of service made on the parties (first-class mail, electronic notification, hand delivery, or another type of service) was first-class mail and electronic notification.

If more than one method of service was employed, this certificate of service groups the parties by the type of service. For example, the full name, email address, and where applicable the full name of the person or entity represented, for each party served by electronic transmission is listed under the heading "Service by NEF," and the full name and complete postal address for each party served by mail, is listed under the heading "Service by First-Class Mail."

EXECUTED ON:

By: /s/ Lauren Moyer  
Lauren Moyer, Esq.  
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**Service by First Class Mail**

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West Grove, PA 19390  
Bankruptcy Debtor

**Service by NEF**

KENNETH E. WEST  
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